

Plaintiffs' experts are to be provided by July 9, 2010, reports of Defendants' experts by July 30, 2010 and any response to expert reports by August 13, 2010.

2. The parties and counsel have diligently pursued discovery; however, notwithstanding the best efforts of counsel, there remain three depositions that could not be scheduled until the week of June 21st, the week following the scheduled conclusion of fact discovery.

3. The three depositions can be concluded on June 21 and June 24.

4. The Parties jointly request that the deadline for the close of fact discovery be extended two weeks until July 2, 2010 to permit those depositions to proceed and to allow a week for any followup to the depositions.

5. To allow the parties' expert witnesses adequate time to consider the deposition testimony, the parties jointly request that the deadlines for provision of reports of Plaintiffs' experts, Defendants' experts, and any replies to those reports likewise be extended for two weeks to July 23, 2010, August 13, 2010, and August 27, 2010, respectively.

6. No other deadlines in the Case Management Order are affected by this request.

7. Counsel for Defendants Jeffrey A. Beard, et al. has authorized counsel for Plaintiffs Frank Robert Chester, et al. to sign this motion on her behalf.

WHEREFORE, the parties jointly request that the Court grant this Motion and issue an order extending by two weeks the deadlines for the close of fact discovery, the provision of Plaintiffs' expert reports, the provision of Defendants' expert reports, and the submission of any responses to those expert reports.

Respectfully submitted,

/s/ Maxine M. Woelfling

Maxine M. Woelfling
Morgan, Lewis & Bockius LLP
17 North Second Street, Suite 1420
Harrisburg, PA 17101
Telephone: 717.237.5065
Facsimile: 717.237.5001
Email: mwoelfling@morganlewis.com
PA ID No. Attorney No. 20101

Elizabeth Hoop Fay (PA ID No. 32955)
Joseph B. G. Fay (PA ID No. 33480)
Clare D'Agostino (PA ID No. 68262)
Kenneth M. Kulak (PA ID No. 75509)
Morgan, Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103-2921
Telephone: 215.963.5000
Facsimile: 215.963.5001

David Rudovsky
Kairys Rudovsky Messing & Feinberg, LLP
The Cast Iron Building, Suite 501 South
718 Arch Street
Philadelphia, PA 19106
Telephone: 215.925.4400
drudovsky@krlawphila.com
PA ID No. 15168

/s/ Amy Zapp
Amy Zapp
Chief Deputy Attorney General
Office of Attorney General of Pennsylvania
Special Litigation Section
16th Floor, Strawberry Square
Harrisburg, PA 17120
Telephone: 717.787-6348
Facsimile: 717.783.5431
azapp@attorneygeneral.gov
PA ID No. 28065

Dated: June 15, 2010

CERTIFICATE OF SERVICE

I, Maxine M. Woelfling, hereby certify that on this 15th day of June 2010, I electronically filed the foregoing Joint Motion for a Two Week Extension of the Close of Fact Discovery and the Exchange of Expert Reports with the Court's ECF System and that I also served a copy of it via first class mail, postage prepaid, upon the following:

Amy Zapp
Chief Deputy Attorney General
Office of Attorney General of Pennsylvania
Special Litigation Section
16th Floor, Strawberry Square
Harrisburg, PA 17120

David Rudovsky
Kairys Rudovsky Messing & Feinberg
The Cast Iron Building, Suite 501 South
718 Arch Street
Philadelphia, PA 19106

Elizabeth H. Fay
Joseph B. G. Fay
Clare D'Agostino
Kenneth M. Kulak
Morgan Lewis & Bockius LLP
1701 Market Street
Philadelphia, PA 19103

/s/ Maxine M. Woelfling
Maxine M. Woelfling